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July 1, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket No. 01-92
Consolidated Communications Networks, Inc.
Notice of *Ex Parte***

Dear Ms. Dortch:

On Thursday, June 27, 2019, Ken Weisenberger of Consolidated Communications Networks, Inc. (“CCNI”), with John Kuykendall and Cassandra Heyne of JSI, met via conference call with Alex Minard and Nissa Laughner from the Federal Communications Commission’s (“FCC”) Wireline Competition Bureau (“WCB”). The purpose of the call was to discuss CCNI’s pending petition for waiver of the requirement that a recipient of Rural Broadband Experiment (“RBE”) funding must certify that it completed its build-out obligation to the full one hundred percent of the locations that were derived from the Connect America Model (“CAM”), in order for the recipient to be alleviated from keeping its Irrevocable Letter of Credit (“ILOC”) open.

CCNI receives RBE funding for 171 extremely high cost locations in rural North Dakota, and the company is confident that it has deployed broadband to every single location in the funded census blocks. However, CCNI could only find a total of 162 locations after extensive searching in the sparsely populated census blocks. With no mechanism in place for dealing with location discrepancies, CCNI is faced with a situation where it must continue to pay to keep its ILOC open until the end of the RBE funding term, despite having completed its buildout last year. Furthermore, CCNI is concerned that it will face penalties for not certifying a completed buildout to 171 locations at the end of the funding period. Since CCNI filed its petition for waiver in April, it had to renew its ILOC once again.

During this call, CCNI, JSI, and the WCB staff discussed types of additional evidence CCNI could provide to make its argument for granting the petition more persuasive, so the petition can be granted expeditiously. CCNI emphasized the financial

burden of keeping its ILOC open longer than the amount of time that it needs to be, given that the company has completed its build-out to the best of its ability. Nine of the locations identified in the CAM simply do not exist in the RBE funded blocks. CCNI and JSI discussed the well-known issue of location discrepancies that recipients of A-CAM, CAF Phase II, and RBE funding have brought to the FCC's attention during industry-wide efforts to come up with a mechanism for resolving discrepancies. As a RBE funding recipient, CCNI is on the forefront of showing the FCC how model-based funding in rural census blocks may play out over the funding period. CCNI's petition is also "ahead of the pack" as it completed its RBE build-out early and sought to be verified as completed before the build-out timeframe was over. As such, CCNI is asking the FCC to prioritize its petition and work towards developing an effective mechanism for resolving location discrepancies between the CAM and reality.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Kuykendall".

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Alex Minard
Nissa Laughner